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8 Attorneys for Defendant, COUNTY OF LOS ANGELES

9 UNITED STATES DISTRICT COURT
10 CENTRAL DISTRICT OF CALIFORNIA – WESTERN DIVISION

11 ROLAND VAUGHAN,

12 Plaintiff,

13 v.

14 COUNTY OF LOS ANGELES; a
15 public entity; and DOES 1 through 50,
16 inclusive,

17 Defendants.

Action Filed: October 16, 2018

**DEFENDANT COUNTY OF LOS
ANGELES'S NOTICE OF
REQUEST FOR REMOVAL OF
ACTION UNDER 28 U.S.C 1441(b)
(FEDERAL QUESTION);
DECLARATION OF LAURA E.
INLOW**

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19
20 **PLEASE TAKE NOTICE** that Defendant, County of Los Angeles, hereby
21 requests to remove to this Court the state court action described below, pursuant to
22 the provisions of 28 U.S.C. § 1441(b) on the basis of federal question as follows:
23

24 1. On October 16, 2018, an action was filed in the Superior Court of the
25 State of California in and for the County of Los Angeles entitled *Roland Vaughan*
26 *v. County of Los Angeles*, Case No. 18STCV01014. A true and correct copy of the
27 complaint is attached hereto as Exhibit "A".
28

1 2. The summons and complaint were served on Defendant on or about
2 January 2, 2019. As such, this Notice is timely pursuant to 28 U.S.C. Section
3 1446(b) as it is being filed before a responsive pleading was filed by Defendant
4 and within thirty (30) days of the date that the Summons and Complaint were
5 served on Defendant.
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8 3. This action is a civil action of which this Court has original
9 jurisdiction under 28 U.S.C. Section 1331, and is one which may be removed to
10 this Court by Defendant pursuant to 28 U.S.C. Section 1441 (b) in that it arises
11 under 42 U.S.C. Section 2000, et seq., and 42 U.S.C. Section 12101.
12

13 4. No further proceedings have been had in this matter in the Superior
14 Court of Los Angeles County –Central Judicial District, California.
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16 5. A true and correct copy of Defendant’s Notice of Request for
17 Removal is being filed with the Clerk for the Superior Court of Los Angeles
18 County – Central Judicial District, California and served upon Plaintiff, as required
19 by 28 U.S.C. Section 1446(d). A copy of Defendant’s Notice to the Superior Court
20 is attached hereto as Exhibit “B”.
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22 6. The undersigned counsel for Defendant has read the foregoing and
23 signs this Notice of Request for Removal pursuant to Rule 11 of the Federal Rules
24 of Civil Procedure as required by 28 U.S. C. Section 1446(a).
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1 WHEREFORE, Defendant prays that Case No. BC677032, now pending in
2 the Superior Court of the State of California for the County of Los Angeles, be
3 removed therefrom to this Court.
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5
6 DATED: January 15, 2019 COLLINSON, DAEHNKE, INLOW & GRECO
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8 By:

9 /s/ Laura E. Inlow
10 Laura E. Inlow, Esq.
11 Attorneys for Defendant
12 COUNTY OF LOS ANGELES
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DECLARATION OF LAURA E. INLOW

I, Laura E. Inlow, declare as follows:

1. I am an attorney at law, licensed to practice before the State and Federal Courts of California. I am a partner at Collinson, Daehnke, Inlow & Greco, attorneys of record herein for Defendant, County of Los Angeles. I have personal knowledge of the contents of this declaration and if called upon, I could and would competently testify thereto.

2. *Roland Vaughan v. County of Los Angeles* is a civil action of which this Court has original jurisdiction as it arises under the laws of the United States under 28 U.S.C. Sections 1331 and 1343. Furthermore, this is an action which may be removed to this Court by Defendant pursuant to 28 U.S.C. 1441 (b) and (c) which provide for the removal of any civil action without regard to citizenship or residence of the parties because the causes of action arise under 42 U.S.C . §1988.

3. I have been advised by the County of Los Angeles service was affected on or about January 2, 2019.

I declare under the penalty of perjury under the laws of the United States of America and the State of California that the foregoing is true and correct.

Executed this 16th day of January 2019, at Torrance, California.

/s/ Laura E. Inlow

Laura E. Inlow, Declarant

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PROOF OF SERVICE

Vaughan v. County of Los Angeles

STATE OF CALIFORNIA, COUNTY OF LOS ANGELES

I am employed in the County of Los Angeles, State of California. I am over the age of 18 and not a party to the within action. My business address is 21515 Hawthorne Blvd., Suite 800, Torrance, California 90503.

On January 16, 2019, I served the following document described as:
DEFENDANT COUNTY OF LOS ANGELES' NOTICE OF REQUEST FOR REMOVAL OF ACTION UNDER 28 U.S.C. 1441(b) FEDERAL QUESTION; DECLARATION OF LAURA E. INLOW on all interested parties in this action by placing [X] a true copy [] the original thereof enclosed in sealed envelopes addressed as follows:

Counsel for Plaintiff

Raymond P. Boucher, Esq. SBN 115364
 Hermez Moreno, Esq., SBN 72009
 Brian M. Bush, Esq., SBN 2947136
 BOUCHER LLP
 21600 Oxnard Street, Suite 600
 Woodland Hills, CA 91367-4903
 Tel: 818-340-5400
 Fax: 818-340-5401

[X] (BY MAIL, 1013a, 2015.5 C.C.P.)

[X] I am readily familiar with the firm's practice for collection and processing correspondence for mailing. Under that practice, this document will be deposited with the U.S. Postal Service on this date with postage thereon fully prepaid at Torrance, California in the ordinary course of business. I am aware that on motion of the party served, service is presumed invalid if postal cancellation date or postage meter date is more than one day after date of deposit for mailing in affidavit.

[X] (FEDERAL) I declare that I am employed in the office of a member of the bar of this Court at whose discretion the service was made.

Executed on January 16, 2019 at Torrance, California.


 Marianne Guillinta